



July 2, 2019

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Transforming the 2.5 GHz Band - WT Docket No. 18-120

Dear Secretary Dortch:

In accordance with Section 1.1206 of the Commission's rules, we hereby provide you with notice of an ex parte presentation in connection with the above-captioned proceedings. On June 28, 2019, Ted Carlson (Chairman of U.S. Cellular), Joe Hanley (Sr. VP – Telephone & Data Systems, Inc.) along with the undersigned met in separate meetings with Commissioner Starks and his Chief of Staff William Davenport and with Umair Javed of Commissioner Rosenzenworcel's office. U.S. Cellular stressed its commitment to serving rural areas. 63% of U.S. Cellular customers live in RSAs whereas nationally, only 23% of Americans live in RSAs.

During the course of the meetings we discussed the attached presentation regarding EBS spectrum. As part of those discussions, we stressed our support for the band plan proposed in comments by WISPA with a clarification that the J Block would be included with "Block 3" as described in the attached presentation. This band plan would provide better opportunities for small and regional carriers to compete and win spectrum essential for the provision of 5G services in rural areas. This plan presents a much better set of options than the "single winner takes all 100 MHz" proposal the Commission is considering in the draft order.

As part of stressing the relative importance of 2.5 GHz, we indicated that based upon our internal engineering analysis, when comparing radius of a cell site – a carrier needs 64% more cell sites using C Band spectrum than 2.5 GHz spectrum to provide a comparable service. When comparing 2.5 GHz to CBRS, 169% more cell sites would be required using CBRS.

Sincerely,

/S/

Grant B Spellmeyer
Vice President – Federal Affairs & Public Policy

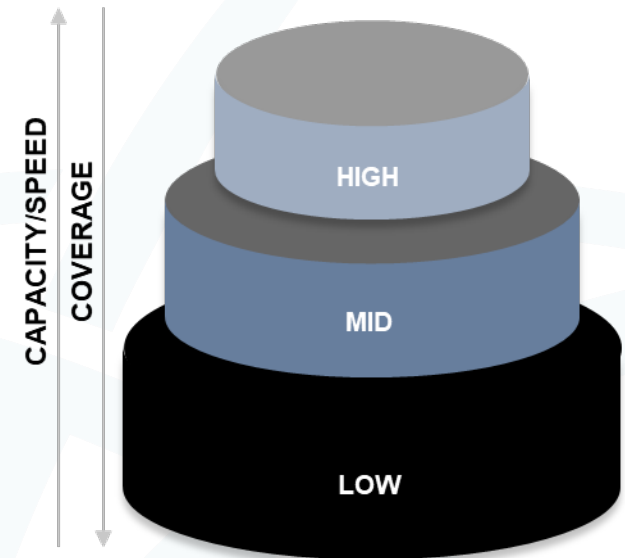


Mid-Band Spectrum Policy Transforming the 2.5 GHz Band

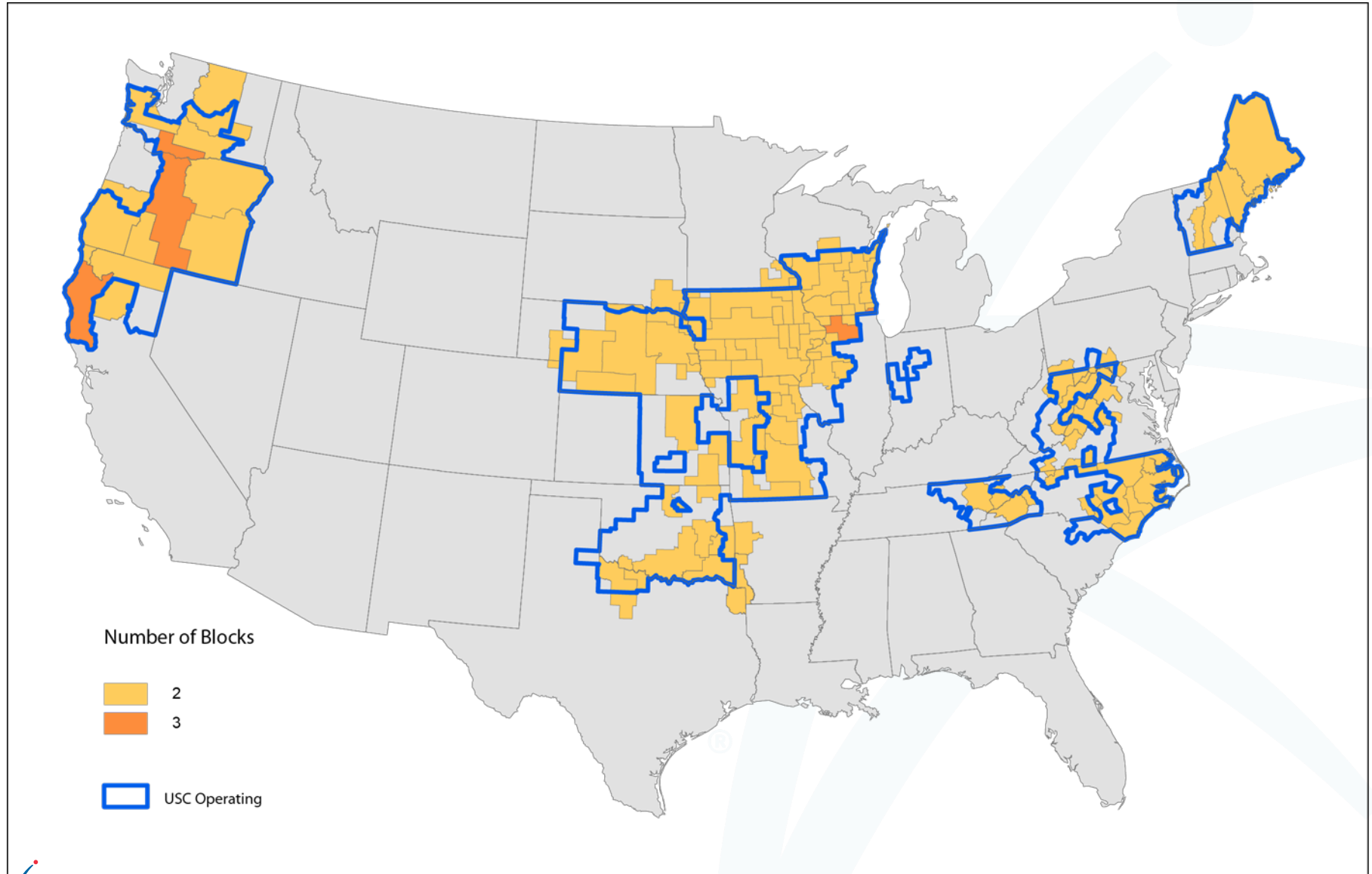
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U.S. Cellular Plans for 5G

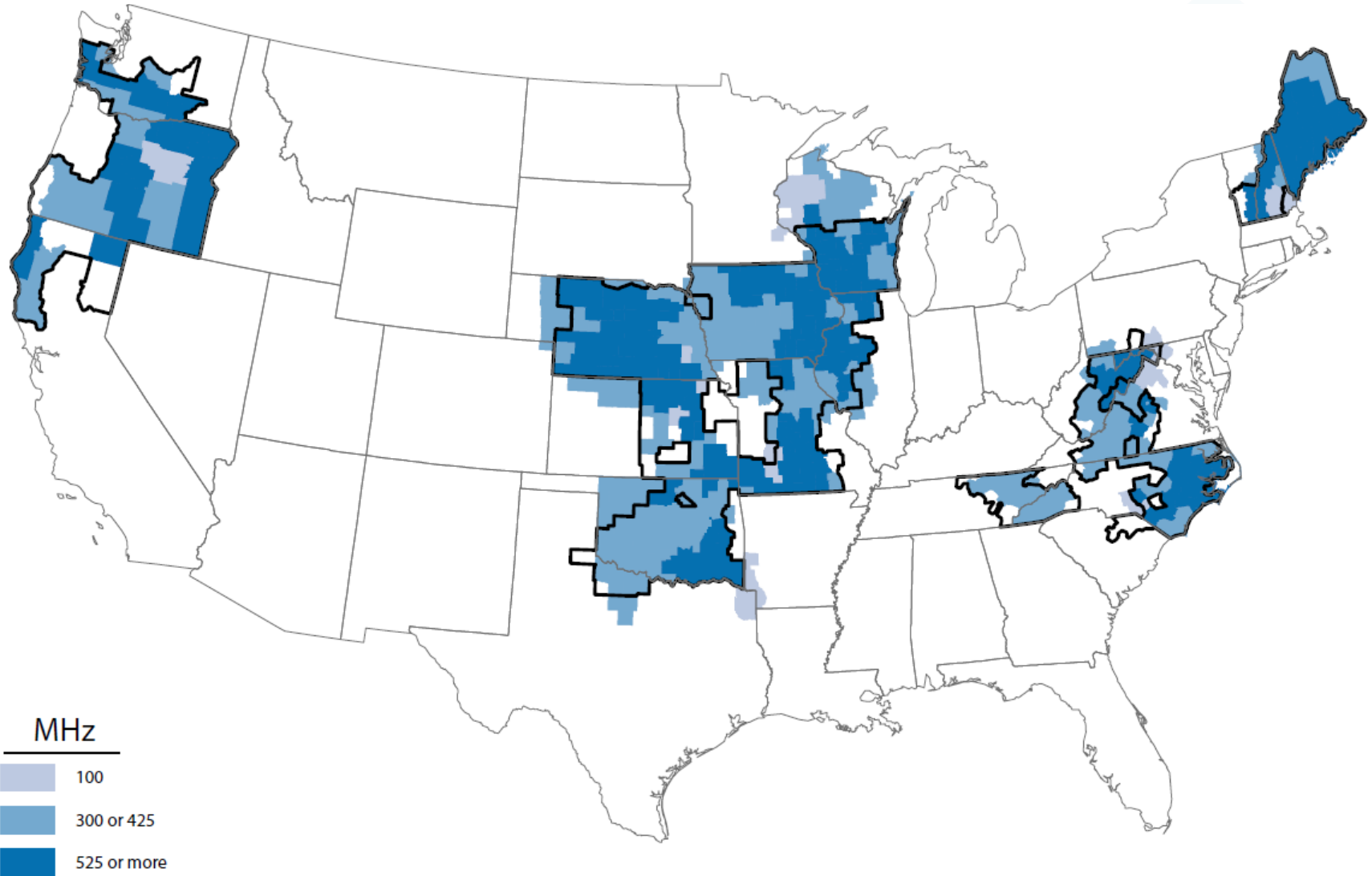
- U.S. Cellular is actively preparing to launch 5G service
- 6th Largest Purchaser of 600 MHz Spectrum
- 2nd Largest Purchaser of 28 GHz Spectrum in Auction 101
- 3rd Largest Purchaser of 24 GHz Spectrum in Auction 102
- Significant need for Mid-Band Spectrum to complete 5G deployment



U.S. Cellular Winning Bids – 600 MHz Auction (1002)



U.S. Cellular Winning Bids – mmWave Auctions (101 and 102)



Mid-Band Policy Priorities

- Mid-band spectrum is an essential element in a 5G network deployment
- Unfortunately, mid-band spectrum is a scarce resource in the U.S.
- CBRS, C-Band, and EBS are all needed and should be accessible to all operators – important to foster competition and innovation in 5G services
- Optimal band plans and auction procedures can promote accessibility and prevent foreclosure, while providing flexibility to all bidders

Proposed EBS Report and Order

- U.S. Cellular supports the FCC's goals and most elements of the proposal:
 - Flexible use, overlay auction with incumbent EBS license areas intact, tribal window, county-sized license areas
- We are concerned about the band plan.
- Proposed 100 MHz spectrum block creates a winner take all scenario which effectively forecloses all other carriers from access.
- WISPA proposed Band Plan is a better solution – retains flexibility for multiple winners, while still allowing a single bidder to acquire 100 MHz of contiguous spectrum and deploy as a single 5G channel (with the J Block)

